

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THERESA M. OWENS,

Plaintiff,

v.

CIVIL ACTION No. 04-11562 (JLT)

ELI LILLY AND COMPANY,

Defendant.

DEFENDANT ELI LILLY AND COMPANY'S
LIST OF PROPOSED WITNESSES

Defendant Eli Lilly and Company ("Lilly") may depose the following witnesses during the course of discovery in the above-captioned matter:

1. Dr. Merle Berger (Plaintiff's expert and treater; and
2. Dr. Ann Goulart (Plaintiff's treater).

Lilly reserves the right to supplement and/or amend this list as discovery progresses. Lilly has already deposed the following individuals:

1. Theresa Owens (Plaintiff);
2. Robert Owens (Plaintiff's husband);
3. Patricia Kelley (Plaintiff's mother); and
4. Paul Kelley (Plaintiff's father).

Respectfully submitted,

ELI LILLY AND COMPANY

By Its Attorneys,


James J. Dillon (BBO # 124660)
Brian L. Henninger (BBO # 657926)
FOLEY HOAG LLP
155 Seaport Boulevard
Boston, MA 02111-2600
617-832-1000

Dated: July 28, 2005

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing List of Proposed Deponents was served on July 28, 2005 by .pdf file via electronic mail, upon:

Aaron M. Levine, Esq.
Aaron M. Levine and Associates
1320 19th Street, N.W., Suite 500
Washington, D.C. 20036
Attorneys for Plaintiffs


Brian L. Henninger